

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS & ASHOKA

DEFENDANTS

MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

COME NOW Defendants **Vaughn Perret** and **Charles Leary**, by and through their counsel, Purvis & Co. PLLC, and move the Court to enlarge the time within which they may file their Answer and Defense, or other responsive pleading, to Plaintiff's Third Amended Complaint for Damages, Declaratory and Injunctive Relief, until February 15, 2017, showing unto the Court the following:

Plaintiff filed his Third Amended Complaint for Damages, Declaratory and Injunctive Relief on January 26, 2017. Despite diligent effort and in view of counsel's other concurrent commitments, undersigned counsel has insufficient time within which to complete preparation and filing of the aforementioned Answer, or other pleadings, by the current deadline.

Counsel has conferred with the *pro se* plaintiff and counsel of record for Ashoka, and neither opposes this motion. No party will be prejudiced by the granting of the requested relief, which is not sought for delay or improper purpose but so that justice may be accorded the parties.

In view of the foregoing and in the interests of justice, Defendants pray the Court would grant Defendants Perret and Leary until February 15, 2017 to file their Answer and Defense, or other responsive pleading, to Plaintiff's Third Amended Complaint.

RESPECTFULLY SUBMITTED, this the 8th day of February, 2017.

VAUGHN PERRET, DEFENDANT
and
CHARLES LEARY, DEFENDANT

BY: PURVIS & CO. PLLC

BY: /s/ Jason B. Purvis
Jason B. Purvis, MSB # 100873

OF COUNSEL:

Purvis & Co. PLLC
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CERTIFICATE OF SERVICE

I hereby certify that, on February 8, 2017, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]

/s/ Jason B. Purvis